

REMARKS/ARGUMENTS

Reexamination of the captioned application is respectfully requested.

A. SUMMARY OF THIS AMENDMENT

By the current amendment, Applicants basically:

1. Editorially amend the specification.
2. Apprise the Examiner of the electronic submission of a separate file for a replacement sheet for Fig. 2 to moot the objection in enumerated paragraph 1 of the office action (e.g., correcting reference numerals 202 and 203).
3. Editorially amend claims 1, 3, 4, 6, 7, 11, 13, and 14.
4. Add new claims 16-17, which are dependent claims carved from independent claims 1 and 14, respectively, to concern a fixed broadband network.
5. Respectfully traverse all prior art rejections.
6. Advise the Examiner of the simultaneous filing of a Petition to Extend.

B. PATENTABILITY OF THE CLAIMS

Claims 1-15 stand rejected under 35 USC 102(e) as being anticipated by U.S. Patent 7,127,250 to Gallagher et al (see enumerated paragraph 3 of the Office Action). All prior art rejections are respectfully traversed for at least the following reasons.

Gallagher (US 7,127,250) does not disclose or suggest the features of independent claims 1, 11 or 14. More specifically, Gallagher fails to disclose the features of claim 1 whereby *the access controller is associated with one or more location areas in said licensed radio mobile network and comprises a database for storing identification*

information of mobile stations in association with address information of said mobile stations on a broadband network.

The subject matter of Applicant's independent claims enables the unlicensed access network to appear like any other access network connected to the public mobile network. More specifically, the access controller is given a location area identity that is known by the public mobile network and used in this network for handover to and from the unlicensed access network. The access controller, however, comprises a database containing the necessary information to locate and forward calls to mobile stations. This permits a mobile station to be located in many different physical locations yet be assigned to the same public mobile network location area. The public mobile network thus requires very little configuration as the access controller is charged with tracking the actual location of the mobile stations.

In contrast, Gallagher provides distinct indoor access network (IAN) location areas and routing areas. As illustrated in Figs. 13 and 14, these areas may be identical to location areas in the outdoor network (public mobile network), they may overlap outdoor network location and routing areas or they may be completely separate. There is no disclosure in Gallagher of the indoor network controller 123 being associated with a location area in the outdoor network. In other words, there is no disclosure of how the location areas of the indoor network are configured in the outdoor network.

Moreover, there is no description whatsoever in Gallagher of a database held or accessible by the indoor network controller in which the identification of mobile stations is stored in association with address information of the mobile station on the broadband network. In this regard, the passage cited by the Office Action at col. 12, lines 1 to 9 of Gallagher which describes the registration of a mobile station with the network actually

relates to GSM/GPRS registration (see col. 11, lines 60-67). This registration is thus not conducted by the indoor network controller 132.

Finally, there is no disclosure in Gallagher of the deletion of this information when the mobile station ceases to operate in the coverage area of the indoor network. The paragraph bridging columns 16 and 17 cited by the Office Action describes the detachment and deregistration of a mobile station from the indoor network. However, the sole reference to the function of the indoor network controller when deregistration is signalled is to change "the mobile station state to "Inactive" or a similar state" (see col. 17, lines 22-24).

In summary, therefore, Gallagher fails to disclose, e.g.: the association of the indoor network controller with one or more location areas in the external network, that the indoor network controller comprises a database for storing mobile station identification information in association with mobile station address information on the broadband networks and, that the access controller is adapted to delete the identification data when the mobile station ceases to operate in the coverage areas of the indoor network.

With regard to claim 11, Gallagher fails to disclose the network controller *registering said mobile station identification information in association with information identifying at least one access point in said access point controller, and updating said registered information when communication between said mobile station and said unlicensed radio access network ceases.*

By registering a mobile station identification in association with an access point, the access controller is able to forward messages to individual mobile stations without having to page the whole location area.

Gallagher is silent about the function of the indoor access network controller upon registration of a mobile station. At the very least, there is no disclosure the storage of this information in association, nor of the updating of this information when communication between the mobile station and the indoor network ceases.

Similar arguments apply to claim 14. This claim is specifically directed to the case wherein the access points are essentially transparent access points that relay messages between the mobile stations and access controller. In this arrangement the mobile station registers directly with the access controller and hence is given a network address on the broadband network. Such a configuration is not disclosed in Gallagher. Moreover there is no disclosure in Gallagher of an indoor network controller 132 *establishing communication with a mobile station using a network address on said broadband network for said mobile station* nor of the indoor network controller *registering said mobile station identification information in association with said mobile station network address on said broadband network*. Finally, Gallagher fails to disclose that the indoor network controller determines *when a connection established with said mobile station is no longer maintained and deleting said mobile station identification information when it is determined that a connection is no longer maintained*.

As mentioned above, Gallagher is silent about what information is stored in the indoor network controller or of the specific functions of this controller when a mobile station connects or leaves the indoor network.

For the above reasons, all claims are patentable over Gallagher.

C. MISCELLANEOUS

In view of the foregoing and other considerations, all claims are deemed in condition for allowance. A formal indication of allowability is earnestly solicited.

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Should the Examiner feel that an interview with the undersigned would facilitate allowance of this application, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: /H. Warren Burnam, Jr./

H. Warren Burnam, Jr.
Reg. No. 29,366

HWB:lsh
901 North Glebe Road, 11th Floor
Arlington, VA 22203-1808
Telephone: (703) 816-4000
Facsimile: (703) 816-4100